

1 NICHOLAS A. TRUTANICH
2 United States Attorney
2 Nevada Bar Number 13644
3 BRETT C. RUFF
3 Assistant United States Attorney
4 501 Las Vegas Boulevard South, Suite 1100
4 Las Vegas, Nevada 89101
5 Tel: 702.388.6336 / Fax: 702.388.6418
5 Brett.Ruff@usdoj.gov
6 *Attorneys for the United States*

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

Case No.: 2:20-cr-00029-RFB-BNW

11 v.

NOTICE OF EXPERT TESTIMONY

12 DEMETRIUS WARE,

13 Defendant.

14
15 The United States of America, by and through NICHOLAS A. TRUTANICH,
16 United States Attorney, and BRETT C. RUFF, Assistant United States Attorney, hereby
17 gives notice of the following Expert Testimony pursuant to Federal Rule of Criminal
18 Procedure 16(a)(1)(G).

19 The government intends to offer the testimony of the Bureau of Alcohol, Tobacco,
20 Firearms and Explosives Special Agent Roger Martin. The government expects that Special
21 Agent Martin will testify that based on his training, education, and experience, as well as
22 his research and his analysis of the firearm recovered in this case, that the firearm was not
23 manufactured in Nevada and traveled in interstate commerce. Special Agent Martin also is
24 expected to testify regarding: (a) the methodologies he employed in analyzing the firearm;

1 (b) the chain of custody related to those procedures; and (c) any other area that is within his
2 area of expertise which is helpful to the jury's comprehension of the relevant issues and
3 facts in this case. Special Agent Martin will also testify regarding any observations which
4 were made during the examination process.

5 Special Agent Martin's statement of qualifications is attached to this Notice as
6 Exhibit 1. A report memorializing the substance of Special Agent Martin's testimony has
7 been produced in discovery.

8

9 DATED: March 10, 2020

10 NICHOLAS A. TRUTANICH
11 United States Attorney
12 District of Nevada

13 */s/ Brett C. Ruff*
14 BRETT C. RUFF
15 Assistant United States Attorney

1 **Certificate of Service**

2 I, Brett C. Ruff, hereby certify that I am an employee of the United States
3 Attorney's Office for the District of Nevada and that on this day I served an electronic copy
4 of the foregoing document on Counsel of Record via Electronic Case Filing (ECF).

5 Dated: March 10, 2020

6 */s/ Brett C. Ruff*
7 BRETT C. RUFF
Assistant United States Attorney